



February 14, 2014

Ken Alex, Director
Governor's Office of Planning and Research
1400 10th Street
Sacramento, California
95812-3044

RE: Preliminary Evaluation of Alternative Methods of Transportation Analysis

Dear Director Alex,

Thank you for the opportunity to provide feedback on the *Preliminary Evaluation of Alternative Methods of Transportation Analysis*. SB 743 provides an important opportunity to better align CEQA with the overarching goals of improving mobility, reducing greenhouse gas emissions, and building healthy communities. The undersigned organizations appreciate OPR's early attention to the critical issue of identifying a suitable metric to replace Level of Service (LOS) in CEQA analysis.

We recommend that OPR focus on Vehicle Miles Traveled (VMT) as the most suitable metric. As your evaluation points out, VMT is straightforward to analyze, captures the effects of regional location, and indirectly accounts for the benefits of active transportation and transit projects. Importantly, VMT's inclusion in CEQA would align project-level decisions with the state's larger planning framework, notably SB 375, and with regional policies and investment priorities embedded in the RTP/SCS. Using VMT would also allow for a more balanced corridor level planning process that capable of incorporating multimodal transportation options.

We recommend that the new metric should be applied statewide, not just in Transit Priority Areas (TPAs). Having two separate methods for TPAs and non-TPAs will be burdensome and confusing for lead agencies, project applicants and community stakeholders. A single, uniform set of thresholds will simplify the CEQA process. Likewise, applying the measure statewide will ensure that areas where transit has not yet been established can still benefit from infill development that supports reduced vehicle miles travel.

The shift from LOS to VMT will result in better outcomes in all types of communities, from city centers and Transit Oriented Development (TOD) districts to suburban and exurban neighborhoods. Indeed, many older suburbs and residential neighborhoods are taking steps to

make their communities more walkable, bikeable and transit-friendly. Removing LOS from the CEQA equation and replacing it with VMT will reduce barriers to safe routes to school, complete streets, first and last mile projects, bike lanes, streetscape improvements, traffic calming, infill development and other projects in these communities.

We recognize that many cities and agencies currently use LOS as a standard for determining development fees, assessing project impacts and measuring system performance. We recommend that OPR consider the following as next steps to help jurisdictions in California make the transition to using VMT:

- Conduct a statewide “nexus study” or provide additional resources to reduce the burden on local agencies interested in amending existing policies (such as development fee requirements, transportation demand management ordinances and congestion mitigation programs) to include VMT instead of LOS.
- Provide modeling tools (such as clear VMT thresholds) to local jurisdictions for assessing VMT impacts on new projects, plans and policies.
- Support providing additional resources for modeling and data collection for transportation agencies at the county and regional level to assess the impacts of system wide performance.

Thank you for your consideration of our input. To discuss any of these concepts further please contact Jeanie Ward-Waller (jeanie@saferoutespartnership.org) or Jessica Meaney (jessica@saferoutespartnership.org).

Sincerely,



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